



Supplemental Inspection Procedures



Supplemental Inspection Program Objectives and Philosophy

- The Supplemental Inspection Program supports higher level goals of maintaining safety, enhancing public confidence, improving effectiveness and efficiency of the regulatory process, and reducing unnecessary regulatory burden.



Supplemental Inspection Program Objectives and Philosophy (Con't)

- Provides additional information beyond Baseline Inspections and performance indicators at facilities with known risk-significant (white, yellow, red) performance issues.



Supplemental Inspection Program Applicability

- All strategic performance areas and cornerstones of safety.



Supplemental Inspection Program General Description

- Three supplemental inspection procedures that become deeper and broader as safety significance of the performance issues increases.
- IP-95001 - Supplemental Inspection for One or Two White Inputs in a Strategic Performance Area



Supplemental Inspection Program General Description

- IP - 95002 - Supplemental Inspection Procedure for One Degraded Cornerstone or any Three White Inputs In a Strategic Performance Area.
- IP - 95003 - Supplemental Inspection Procedure for Repetitive Degraded Cornerstones, Multiple Degraded Cornerstones, Multiple Yellow Inputs, or 1 Red Input.



Action Matrix

		Licensee Response Column	Regulatory Response Column	Degraded Cornerstone Column	Multiple Repetitive Degraded Cornerstone Column	Unacceptable Performance Column
Results		All assessment inputs (performance Indicators (PI) and inspection findings) Green; cornerstone objectives fully met	One or two White inputs (in different cornerstones) in a strategic performance area; Cornerstone objectives fully met	One degraded cornerstone (2 White inputs or 1 Yellow input) or any 3 White inputs in a strategic performance area; cornerstone objectives met with minimal reduction in safety margin	Repetitive degraded cornerstone, multiple degraded cornerstones, multiple Yellow inputs, or 1 Red input ¹ ; cornerstone objectives met with longstanding issues or significant reduction in safety margin	Overall unacceptable performance: plants not permitted to operate within this band, unacceptable margin to safety
Response	Regulatory Conference	Routine Senior Resident Inspector (SRI) interaction	Branch Chief (BC) or Division Director (DD) meet with Licensee	DD or Regional Administrator (RA) meet with Licensee	EDO (or Commission) meet with Senior Licensee Management	Commission meeting with Senior Licensee Management
	Licensee Action	Licensee Corrective Action	Licensee corrective action with NRC oversight	Licensee self assessment with NRC oversight	Licensee performance improvement plan with NRC oversight	
	NRC Inspection	Risk-informed baseline inspection program	Baseline and supplemental inspection 95001	Baseline and supplemental inspection 95002	Baseline and supplemental inspection 95003	
	Regulatory Actions	None	Document response to degrading area in assessment letter	Document response to degrading condition in assessment letter	10 CFR 2.204 DFI 10 CFR 50.54(f) letter CAL/Order	Order to modify, suspend, or revoke licensed activities
Communications	Assessment Report	BC or DD review / sign assessment report (w/ inspection plan)	DD review / sign assessment report (w/ inspection plan)	RA review / sign assessment report (w/ inspection plan)	RA review / sign assessment report (w/ inspection plan) Commission informed	
	Public Assessment Meeting	SRI or BC meet with Licensee	BC or DD meet with Licensee	RA discuss performance with Licensee	EDO (or Commission) discuss performance with Senior Licensee Management	Commission meeting with Senior Licensee Management
Increasing Safety Significance →						

¹ It is expected in a few limited situations that an inspection finding of this significance will be identified that is not indicative of overall licensee performance. The staff will consider treating these inspection findings as exceptions for the purpose of determining appropriate actions.



IP 95001 Overview

- Boundary Conditions
 - Supplemental Inspections will not be performed for single or multiple green issues.
 - Supplemental Inspections are independent from Baseline Inspection procedures for PI&R.
 - Inspection requirements are the same regardless of whether the issue emanated from a performance indicator or an inspection finding.



IP 95001 Overview

- Procedure Objectives
 - To provide assurance that the root causes and contributing causes of risk significant issues are understood.
 - To provide assurance that the extent of condition of risk significant performance issues are understood.
 - To provide assurance that licensee corrective actions for risk significant issues are sufficient to address the root and contributing causes, and to prevent recurrence.



IP 95001 Overview

- Inspection Requirements
 - Problem Identification - Who, how long, and risk assessment.
 - Root cause and extent of condition - identification of root and contributing causes, adequacy of depth, consideration of prior operating experience, and consideration of common cause and extent of condition.
 - Review of proposed corrective actions - do corrective actions address root and contributing causes and prevent recurrence ?



IP 95002 Overview

- Boundary conditions and objectives are same as IP 95001
- Inspection requirements are the same as IP 95001, except procedure adds independent NRC assessment of extent of condition and reviews licensee's collective root cause evaluation for multiple white issues.



IP 95002 Overview

- Independent extent of condition assessment is performed using procedure from table in Appendix B of 2515 consisting of a mix of old regional initiative procedures, baseline inspection procedures, and new procedures (e.g., human factors)



IP 95003 Overview

- Diagnostic-like procedure designed to provide supplemental information regarding licensee performance as necessary to determine the breadth and depth of safety, organizational, and programmatic issues.



IP 95003 Overview

- While the procedure allows for focus to be applied to areas where performance issues have been previously identified, the procedure does require that some sample reviews be performed for all key attributes of the affected strategic performance area(s).



IP 95003 Overview

- The results of this inspection will aid the NRC in deciding whether additional regulatory actions are necessary to assure public health and safety.



IP 95003 Overview

- Boundary Conditions
 - The NRC performs the inspection.
 - IP 95003 is not to be used for event response.
 - The procedure is not a substitute for a more focused analysis (or self assessment) of specific performance issues to be performed by the licensee or third party.



IP 95003 Overview

- Inspection Objectives
 - To provide additional information to be used in deciding whether additional regulatory actions are necessary to arrest declining plant performance (e.g., orders, CALs, etc.)
 - To provide an independent assessment of risk significant issues to aid in determination of whether an unacceptable margin to safety exists.



IP 95003 Overview

- Inspection Objectives (continued)
 - To independently assess the adequacy of the programs and processes used by the licensee to identify, evaluate, and correct performance issues.
 - To independently evaluate the adequacy of programs and processes in the affected strategic performance area(s).



IP 95003 Overview

- Inspection Objectives (continued)
 - To provide insight into the overall root and contributing causes of identified performance deficiencies.
 - To determine if the NRC Oversight Process provided sufficient warning to significant reductions in safety.



IP 95003 Overview

- Inspection Requirements
 - Identification of affected strategic performance areas.
 - Review of licensee control systems including effectiveness of licensee's processes for assessing performance issues; establishment and prioritization of corrective actions; and establishment of a safety conscious work environment.



IP 95003 Overview

- Inspection Requirements (continued)
 - Specific requirements and guidance sections for each performance area and key attribute.
 - Assessment of root and contributing causes.
 - Evaluation of NRC's oversight process.